



3. At present, all Defendants' deadlines to respond to the Complaint, except for Officer Robert Douglas and Officer Vern Whitworth, are fixed at December 11, 2023 (see Dkt. Nos. 10, 11, 12, 30). Plaintiffs have agreed to extend those deadlines, along with the past deadlines for Officer Douglas and Officer Whitworth to respond, until December 27, 2023.

4. All parties except for Discovery Green and Barry Mandel have only recently become represented in this matter this week, thus requiring counsel to prepare a defense for these parties at this time.

5. Accordingly, Defendants respectfully request that the deadlines for all Defendants to respond to the Complaint be extended to December 27, 2023.

6. Counsel for Plaintiffs have advised they have no objection to this request.

## **II. BRIEFING SCHEDULE**

7. In addition, some, if not all, Defendants anticipate moving to dismiss the Complaint pursuant to FED.R.CIV.P. 12(b), in lieu of filing an Answer. Defendants have anticipatorily agreed that if they do so, Plaintiffs' deadline to respond to any such motions will be extended to January 24, 2024. Plaintiffs agree that Defendants shall have until February 7, 2024, to file reply papers.

## **III. PRAYER FOR RELIEF**

8. Accordingly, the Parties request that the following deadlines be set concerning the Complaint:

- **All Defendants' deadlines to answer or otherwise move against the Complaint shall be extended to December 27, 2023.**
- **Plaintiffs shall have until January 24, 2024, to respond to any FED.R.CIV.P. 12(b) motions filed against the Complaint**
- **Defendants shall have until February 7, 2024, to submit any reply papers to Plaintiffs' response to any such motions**

Respectfully submitted,

s/ Andrew S. Holland

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CERTIFICATE OF SERVICE

I, Andrew S. Holland, certify that today, December 8, 2023, I filed the within joint motion for a briefing schedule with CM/ECF, for filing and service upon all attorneys who have appeared.

s/ Andrew S. Holland  
ANDREW S. HOLLAND